

INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE (IACP)
MAJOR CITIES CHIEFS ASSOCIATION (MCC)
NATIONAL SHERIFFS' ASSOCIATION (NSA)
MAJOR COUNTY SHERIFFS' ASSOCIATION (MCSA)

April 26, 2005

To: Federal Communications Commission

RE: E-911 Service, CC Docket 94-102

Support of APCO Petition for Declaratory Ruling

The International Association of Chiefs of Police, Major Cities Chiefs Association, National Sheriffs' Association, and Major County Sheriffs' Association hereby inform the Federal Communications Commission (FCC) of our support of the Petition for Declaratory Ruling submitted in the above-referenced proceeding by the Association of Public-Safety Communications Officials-International (APCO). The APCO Petition and subsequent Supplement urge the FCC to clarify its E-911 rules for wireless carriers. Specifically, APCO urges that the level of accuracy for locating wireless E-911 calls must be measured at the local level and not averaged over entire states. We share the APCO concern that too large a measurement area will leave some public safety answering points (PSAPs) with very poor levels of accuracy, making it difficult for police and other public safety personnel to locate emergencies in a timely manner. Our law enforcement agencies cannot afford to devote scarce resources to search for every emergency reported by a wireless caller.

The named organizations, representing the executive leadership of the nation's law enforcement community, support the APCO Petition and firmly believe that wireless E-911 accuracy testing should be required at the local community level. The fact remains that Phase II E-911 services are requested, deployed and utilized at the local level, contracts between wireless carriers and PSAPs are initiated at the local level, and responses to calls begin at the local level. It is also important to require retesting on a periodic basis, no less frequently than every two years.

We urge the FCC to act favorably on the APCO request that the FCC establish clear guidance regarding the relevant geographic area in which wireless carriers must provide and test E-911 accuracy to the levels specified in the FCC's rules.

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